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August 11, 2020

**SUBMITTED EX PARTE
BY ELECTRONIC MAIL**

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Constantinescu et al.*, No. 19 Cr. 651 (LTS)

Dear Judge Swain:

On May 15, 2020, I was appointed pursuant to the Criminal Justice Act to represent Ionela Constantinescu as substitute counsel for the late Kenneth Paul. I write to respectfully request that the Court re-authorize the appointment of Jacob Mitchell, *nunc pro tunc* to May 15, 2020, to assist me in representing Ms. Constantinescu in this matter.

On November 4, 2019, the Court previously appointed Mr. Mitchell as associate counsel to assist Mr. Paul in representing Ms. Constantinescu at the rate of \$110 per hour. *See* ECF No. 102. Mr. Mitchell has been instrumental in quickly familiarizing me with the case and providing continuity for Ms. Constantinescu, with whom Mr. Mitchell has developed a rapport. The latter is especially critical during this time when in-person attorney visits are difficult or impossible. Enclosed please find a proposed order authorizing the appointment of Mr. Mitchell *nunc pro tunc* to May 15, 2020 at a rate of \$110 per hour. Thank you for your considerate attention to this matter

Respectfully submitted,



Ezra Spilke

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

MIRCEA CONSTANTINESCU, et al.,

Defendants.

19 Cr. 651 (LTS)

ORDER

Upon the application of Ionela Constantinescu, a defendant in this matter, by his attorney Ezra Spilke, for an order authorizing the appointment of Jacob Mitchell, Esq. *nunc pro tunc* pursuant to Criminal Justice Act, 18 U.S.C. § 3006A;

IT IS HEREBY ORDERED, that Jacob Mitchell, Esq. is appointed *nunc pro tunc* to May 15, 2020, to assist in the representation of Ionela Constantinescu in the above-captioned matter, pursuant to Criminal Justice Act, 18 U.S.C. § 3006A, and is authorized to bill at the rate of one hundred and ten dollars (\$110) per hour.

Dated: New York, New York
August 11, 2020

DE# 310 is resolved.

SO ORDERED

/s/ Laura Taylor Swain
The Honorable Laura Taylor Swain
District Judge, United States District Court
Southern District of New York